

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JOHN THOMSON,)	
)	
Plaintiff,)	
)	
v.)	CAUSE NO.: 1:23-CV-00099-SEB-MG
)	
ROCHE DIAGNOSTICS CORPORATION,)	
)	
Defendant.)	

PLAINTIFF’S MOTION TO MAINTAIN DOCUMENTS UNDER SEAL

Pursuant to Rule 5.2(a) of the Federal Rules of Civil Procedure, and Southern District of Indiana Local Rule 5-11(d)(2)(A)(ii), Plaintiff respectfully submits this Motion to Maintain Documents Under Seal.

Plaintiff seeks to maintain Exhibits A through G to his Second Amended Complaint under seal. Exhibits C, D, E, F, and G are Plaintiff’s compensation plans which have been designated “Confidential” by Defendant Roche Diagnostics Corporation. Exhibits A and B are personnel documents which refer to Plaintiff’s compensation plans. Defendant has identified personnel files, compensation plans and related documents as protected information in the Stipulated Protective Order [Dkt. 21].

WHEREFORE, Plaintiff respectfully requests that the Court accept Exhibits A through G to Plaintiff’s Second Amended Complaint under seal, and maintain these seven documents under seal until further order of the Court.

Dated: May 16, 2023

/s/ Annavieve C. Conklin
Kathleen A. DeLaney (#18604-49)
Annavieve C. Conklin (#33875-32)

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